

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

R.M.S. TITANIC, INC.,  
successor-in-interest to  
Titanic Ventures, limited partnership,  
Plaintiff,

v.

Civil Action No. 2:93cv902

THE WRECKED AND ABANDONED VESSEL, et al.,  
Defendant.

**PERIODIC REPORT OF R.M.S. TITANIC, INC.  
ON THE PROGRESS OF RESEARCH AND RECOVERY OPERATIONS**

NOW COMES Plaintiff, R.M.S. Titanic, Inc. (“RMST” or the “Company”), by counsel, and files this Periodic Report of R.M.S. Titanic, Inc. on the Progress of Research and Recovery Operations (“Periodic Report”).

**I. Corporate Developments**

On April 1, 2021 Jessica Sanders replaced Bretton Hunchak as Chief Executive Officer of Experiential Media Group LLC and President of RMS Titanic, Inc. Ms. Sanders has been an employee of the Company and its predecessors since 2007, previously serving in a number of roles including Chief Administrative Officer, Director of New Content, Director of Administration, and Vice President of Corporate Affairs. Ms. Sanders has played a critical role in helping the Company navigate through changes in management, strategic transactions and initiatives, and the reorganization. She has attended numerous hearings before this Court, and carries extensive institutional knowledge about the Company.

**II. Expeditions**

On March 31, 2021, OceanGate Expeditions announced it intends to conduct a “Survey Expedition” to Titanic this summer. *See*, March 31, 2021 press release attached hereto as Exhibit A. This Court has required third-parties seeking to conduct expeditions to the wreck to submit their

dive plans to the Court to ensure that such activities would not violate this Court's constructive in rem jurisdiction over the wreck. While certain activities may not implicate this Court's jurisdiction over the wreck, the Court may nevertheless enforce salvage rights by prohibiting a third-party from, "interfering with the salvor's exclusive possession of the wreck." *R.M.S Titanic, Inc. v Haver*, 171 F. 3d 943, 970.

### **III. Reserve Account**

As of April 30, 2021, the balance in the reserve account was \$971,231.20. The Company made its recent quarterly deposit on February 27, 2021.

### **IV. Titanic Exhibitions**

EMG (US) continues to operate the permanent Titanic exhibitions in Las Vegas, Nevada and Orlando, Florida, and has successfully contracted to provide a temporary exhibition in Boise, Idaho.

Respectfully submitted,

**RMS TITANIC, INC.**

By Counsel:

/s/ William R. Poynter  
William R. Poynter, VSB #48672  
KALEO LEGAL  
4456 Corporation Lane, Suite 135  
Virginia Beach, VA 23462  
Tel: (757) 238-6383  
Fax: (757) 304-6175  
E-Mail: [wpoynter@kaleolegal.com](mailto:wpoynter@kaleolegal.com)

David G. Barger, VSB #21652  
GREENBERG TRAURIG, LLP  
1750 Tysons Boulevard, Suite 1000  
McLean, Virginia 22102  
Tel: (703) 749-1300  
Fax: (703) 749-1301  
Email: [BargerD@gtlaw.com](mailto:BargerD@gtlaw.com)

*Counsel for R.M.S. Titanic, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 5, 2021, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ William R. Poynter

William R. Poynter, VSB #48672

KALEO LEGAL

4456 Corporation Lane, Suite 135

Virginia Beach, VA 23462

Tel: (757) 238-6383

Fax: (757) 304-6175

E-Mail: [wpoynter@kaleolegal.com](mailto:wpoynter@kaleolegal.com)

*Counsel for R.M.S. Titanic, Inc.*